

EXHIBIT D



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May 24, 2024

VIA EMAIL

Carl Hittinger
Baker & Hostetler LLP
1735 Market St., Suite 3300
Philadelphia, PA 19103
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Re: Bobrick Washroom Equipment, Inc.'s Sale of Non-Compliant Partitions

Dear Carl:

As you are aware, during Matt Louchheim's recent deposition, he was presented with Intertek testing reports demonstrating that Bobrick's laminate partitions do not meet ASTM E84 Class B fire rating standards, as marketed by Bobrick. Mr. Louchheim testified that Bobrick has not tested these partitions over the past 20 years to determine whether they still meet that fire rating standard. Mr. Louchheim also acknowledged that there have been changes to those partitions since the original testing certification.

Mr. Louchheim testified under oath—as the President of Bobrick—that he would conduct testing of Bobrick's incorrectly marketed partitions and, if necessary, update the materials used in those partitions as well as any mischaracterizations of the fire rating applicable to Bobrick's partitions.

Although our investigation is ongoing, we have reason to believe that Bobrick's actions to date have violated state and federal laws. This is an issue that we believe warrants immediate attention. To that end, as we evaluate our legal options, we request an update on Matt Louchheim's efforts to address this troubling situation. Any such information you can provide will help us evaluate next steps.

Meanwhile, we demand that you preserve, and do not destroy, any documents or electronic files in your possession relating or referring to or in any way connected to the fire rating of Bobrick's partitions. This demand includes, but is not limited to, any written or electronic communications (such as emails or instant messages) and hard copy records



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maintained by Bobrick, your office, and/or any individual employed by Bobrick. All such records must be maintained in their current form, and not be altered or modified in any way. Bobrick must immediately suspend deletion, overwriting, or any other possible destruction of electronic information or hard copies of documents. This includes, but is not limited to: email and other electronic communications; text messages; word processing documents; documents concerning fire performance testing of toilet partitions conducted by Bobrick or by a third party; documents reflecting any compensation to any consultant for their work on behalf of Bobrick in connection with any fire rating code; communications involving Bobrick or any Bobrick consultant concerning fire rating codes and their applicability to HDPE partitions; documents mentioning fire rating standards; communications concerning the accuracy of Bobrick's fire rating claims, including internal communications concerning Bobrick's claim that Bobrick laminate partitions meet ASTM E84, Class B; client files (both hard copy and network files) for all sales of Bobrick's partitions, including invoices for the sale of partitions; any records identifying the ultimate location that Bobrick's partitions are installed; accounting and financial records; calendars; telephone logs; contact information; Internet usage files; offline storage or information stored on removable media; information contained on laptops or other portable devices; and network access information. You are prohibited from tampering with or destroying any and all potential evidence (including your cell phone and personal computers) relevant to this dispute, and Scranton Products reserves all rights it may have in the event of any violation of the foregoing.

I understand that you may claim that some materials subject to this legal hold are protected by a privilege, but that does not preclude your obligation to preserve such documents. The applicability of any privilege will be determined in due course.

If you have any questions concerning the above, please contact me.

WINSTON
& STRAWN
LLP

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Respectfully,

A handwritten signature in blue ink, appearing to read "Steve Grimes", with a stylized flourish at the end.

Steve Grimes